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BY ECF & FAX

Honorable Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 705
New York, NY 10007
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Re: Request to Extend Deadlines to Complete Fact Discovery
***Sanchez et al. v. Rainbow Umbrella, et al.*, 17 Civ. 9065 (“*Sanchez*”)**
***Jochola et al. v. Green Summit Group LLC et al.*, 18 Civ. 1360 (“*Jochola*”)**

Dear Judge Gardephe:

We are the attorneys for all of the defendants in connection with each of the above-referenced related wage and hour actions, with the exception of individual defendant Peter Schatzberg, who is separately represented.

We write with the consent of all the parties to respectfully request an extension of time to complete fact discovery in each of the two related cases – *Sanchez* and *Jochola*. The deadline to complete fact discovery in the *Sanchez* case is currently October 24, 2018, and the deadline to complete fact discovery in the *Jochola* case is currently November 24, 2018.

As Your Honor is aware, these related cases have been referred to a joint and global mediation, which has now been scheduled for November 28, 2018, and, in order to facilitate the mediation, the parties have further agreed to exchange documents and information as required by the *Initial Discovery Protocols FLSA Cases Not Pleaded as Collective Actions* by November 14, 2018.

Accordingly, in view of the scheduled late November mediation, the parties hereby respectfully request that Your Honor adjourn all discovery deadlines for each of the two cases *sine die* and that the Court set such deadlines at the conference in the *Sanchez* case currently scheduled for December 6, 2018, in the event that the mediation is unsuccessful in resolving both cases.

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This is the parties' second request to extend the discovery deadline in the *Sanchez* case and the first request to extend the discovery deadline in the related *Jochola* case.

Thank you, Your Honor, for your consideration in this matter.

Respectfully submitted,

/s/ Andrew P. Yacyshyn

Andrew P. Yacyshyn

cc: All parties by ECF